

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND

IN RE: Laurie J. Faraone

**BK. NO. 19-10606
Chapter 13**

DEBTOR'S PARTIAL OBJECTION TO CLAIM

Now comes the Debtor, by her attorney, John S. Simonian, and hereby partially objects to Claim No. 17 submitted by IslandCap LLC on the following grounds:

The Debtor objects to arrearage being paid. The arrearage should not be paid because this 2nd mortgage is being modified in such a manner in which the arrearage does not need to be paid. There is no objection to this claim being treated as unsecured nonpriority debt.

WHEREFORE, the Debtor respectfully requests this Honorable Court to grant this partial objection to Claim No. 17 submitted by IslandCap LLC for the reasons stated *supra*.

Respectfully submitted,
Laurie J. Faraone
by her attorney

/s/ John S. Simonian

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Within fourteen (14) days if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006 if you were served by mail or other excepted means specified, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you timely file such a response, you will be given thirty (30) days notice of the hearing date for this objection.

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CERTIFICATE OF SERVICE

The undersigned (Attorney for the Debtor) hereby certifies that on the 27th day of August, 2019, a copy of the within Objection to Claim was served to the following:

John Boyajian, Esq.
Chapter 13 Trustee
Via Electronic Notice of Filing

IslandCap LLC Land Home Financial Services
3611 South Harbor Boulevard
Santa Ana, CA 92704
Via U.S. Mail, first class postage prepaid

/s/ John S. Simonian

John S. Simonian